

**STATISTICAL INFORMATION ONLY: Debtor must select the number of each of the following items included in the Plan.**

Valuation of Security     Assumption of Executory Contract or Unexpired Lease     Lien Avoidance

Last revised: August 1, 2020

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In Re: Case No.: 19-13736  
John and Georgina Worthy Judge: JNP  
Debtor(s)

**Chapter 13 Plan and Motions**

☐ Original    ☒ Modified/Notice Required    Date: 08/26/2020  
☐ Motions Included    ☐ Modified/No Notice Required

THE DEBTOR HAS FILED FOR RELIEF UNDER  
CHAPTER 13 OF THE BANKRUPTCY CODE

**YOUR RIGHTS MAY BE AFFECTED**

You should have received from the court a separate *Notice of the Hearing on Confirmation of Plan*, which contains the date of the confirmation hearing on the Plan proposed by the Debtor. This document is the actual Plan proposed by the Debtor to adjust debts. You should read these papers carefully and discuss them with your attorney. Anyone who wishes to oppose any provision of this Plan or any motion included in it must file a written objection within the time frame stated in the *Notice*. Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the *Notice*. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. If this plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

**The following matters may be of particular importance. Debtors must check one box on each line to state whether the plan includes each of the following items. If an item is checked as "Does Not" or if both boxes are checked, the provision will be ineffective if set out later in the plan.**

THIS PLAN:

☐ DOES ☒ DOES NOT CONTAIN NON-STANDARD PROVISIONS. NON-STANDARD PROVISIONS MUST ALSO BE SET FORTH IN PART 10.

☐ DOES ☒ DOES NOT LIMIT THE AMOUNT OF A SECURED CLAIM BASED SOLELY ON VALUE OF COLLATERAL, WHICH MAY RESULT IN A PARTIAL PAYMENT OR NO PAYMENT AT ALL TO THE SECURED CREDITOR. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

☐ DOES ☒ DOES NOT AVOID A JUDICIAL LIEN OR NONPOSSESSORY, NONPURCHASE-MONEY SECURITY INTEREST. SEE MOTIONS SET FORTH IN PART 7, IF ANY.

Initial Debtor(s)' Attorney: SLM    Initial Debtor: JW    Initial Co-Debtor: GW

**Part 1: Payment and Length of Plan**

a. The debtor shall pay \$ 843.00 per month to the Chapter 13 Trustee, starting on  
September 1, 2020 for approximately 30 months.

b. The debtor shall make plan payments to the Trustee from the following sources:

☒ Future earnings

☐ Other sources of funding (describe source, amount and date when funds are available):

c. Use of real property to satisfy plan obligations:

☐ Sale of real property

Description:

Proposed date for completion: \_\_\_\_\_

☐ Refinance of real property:

Description:

Proposed date for completion: \_\_\_\_\_

☐ Loan modification with respect to mortgage encumbering property:

Description:

Proposed date for completion: \_\_\_\_\_

d. ☐ The regular monthly mortgage payment will continue pending the sale, refinance or loan modification.

e. ☐ Other information that may be important relating to the payment and length of plan:

**Part 2: Adequate Protection ☒ NONE**

a. Adequate protection payments will be made in the amount of \$ \_\_\_\_\_ to be paid to the Chapter 13 Trustee and disbursed pre-confirmation to \_\_\_\_\_ (creditor).

b. Adequate protection payments will be made in the amount of \$ \_\_\_\_\_ to be paid directly by the debtor(s) outside the Plan, pre-confirmation to: \_\_\_\_\_ (creditor).

**Part 3: Priority Claims (Including Administrative Expenses)**

a. All allowed priority claims will be paid in full unless the creditor agrees otherwise:

Creditor	Type of Priority	Amount to be Paid
CHAPTER 13 STANDING TRUSTEE	ADMINISTRATIVE	AS ALLOWED BY STATUTE
ATTORNEY FEE BALANCE	ADMINISTRATIVE	BALANCE DUE: \$ 700 subj to court
DOMESTIC SUPPORT OBLIGATION		
MidFirst	Admin Exp - attys fees in connection with cert of default	\$200.00

b. Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount:  
Check one:

☒ None

☐ The allowed priority claims listed below are based on a domestic support obligation that has been assigned to or is owed to a governmental unit and will be paid less than the full amount of the claim pursuant to 11 U.S.C.1322(a)(4):

Creditor	Type of Priority	Claim Amount	Amount to be Paid
	Domestic Support Obligations assigned or owed to a governmental unit and paid less than full amount.		

**Part 4: Secured Claims**

**a. Curing Default and Maintaining Payments on Principal Residence:** ☐ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor shall pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)
Midland/MidFirst Mtg	res mtg	\$9,064.56 remaining bal on poc	0%	\$9,064.56 bal on poc of \$13,364.52	kept current o/s plan
MidFirst	res mtg	\$5,405.99 arrears on cert of default	0%	\$5,405.99	n/a
US Dept of HUD	2nd res mtg	\$0.00	0%	\$0.00	n/a
Regional Acceptance	2014 Dodge	\$616.99	0%	\$616.99 bal on poc	kept current o/s plan
Consumer/Portfolio	2015 Nissan	\$731.11	0%	\$731.11 bal on poc	kept current o/s plan
Beckett Assoc	Assoc	\$1,100.00	0%	\$1,100.00	kept current o/s plan

**b. Curing and Maintaining Payments on Non-Principal Residence & other loans or rent arrears:** ☒ NONE

The Debtor will pay to the Trustee (as part of the Plan) allowed claims for arrearages on monthly obligations and the debtor will pay directly to the creditor (outside the Plan) monthly obligations due after the bankruptcy filing as follows:

Creditor	Collateral or Type of Debt	Arrearage	Interest Rate on Arrearage	Amount to be Paid to Creditor (In Plan)	Regular Monthly Payment (Outside Plan)

**c. Secured claims excluded from 11 U.S.C. 506:** ☒ NONE

The following claims were either incurred within 910 days before the petition date and are secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value:

Name of Creditor	Collateral	Interest Rate	Amount of Claim	Total to be Paid through the Plan Including Interest Calculation

**d. Requests for valuation of security, Cram-down, Strip Off & Interest Rate Adjustments** ☒ **NONE**

1.) The debtor values collateral as indicated below. If the claim may be modified under Section 1322(b)(2), the secured creditor shall be paid the amount listed as the "Value of the Creditor Interest in Collateral," plus interest as stated. The portion of any allowed claim that exceeds that value shall be treated as an unsecured claim. If a secured claim is identified as having "NO VALUE" it shall be treated as an unsecured claim.

**NOTE: A modification under this Section ALSO REQUIRES  
the appropriate motion to be filed under Section 7 of the Plan.**

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor Interest in Collateral	Annual Interest Rate	Total Amount to be Paid

2.) Where the Debtor retains collateral and completes the Plan, payment of the full amount of the allowed secured claim shall discharge the corresponding lien.

**e. Surrender** ☒ **NONE**

Upon confirmation, the stay is terminated as to surrendered collateral only under 11 U.S.C. 362(a) and that the stay under 11 U.S.C 1301 be terminated in all respects. The Debtor surrenders the following collateral:

Creditor	Collateral to be Surrendered	Value of Surrendered Collateral	Remaining Unsecured Debt

**f. Secured Claims Unaffected by the Plan** ☒ **NONE**

The following secured claims are unaffected by the Plan:

**g. Secured Claims to be Paid in Full Through the Plan:** ☒ **NONE**

Creditor	Collateral	Total Amount to be Paid Through the Plan

**Part 5: Unsecured Claims** ☐ **NONE**

**a. Not separately classified** allowed non-priority unsecured claims shall be paid:

- ☐ Not less than \$ \_\_\_\_\_ to be distributed *pro rata*
- ☒ Not less than 100 percent
- ☐ *Pro Rata* distribution from any remaining funds

**b. Separately classified unsecured** claims shall be treated as follows:

Creditor	Basis for Separate Classification	Treatment	Amount to be Paid
Federal Loan-US Dept of ED	student loans	\$0.00-deferred	\$0.00-deferred
Credit Adjustments	student loans	\$0.00-deferred	\$0.00-deferred

**Part 6: Executory Contracts and Unexpired Leases ☒ NONE**

(NOTE: See time limitations set forth in 11 U.S.C. 365(d)(4) that may prevent assumption of non-residential real property leases in this Plan.)

All executory contracts and unexpired leases, not previously rejected by operation of law, are rejected, except the following, which are assumed:

Creditor	Arrears to be Cured in Plan	Nature of Contract or Lease	Treatment by Debtor	Post-Petition Payment

**Part 7: Motions ☒ NONE**

**NOTE: All plans containing motions must be served on all affected lienholders, together with local form, *Notice of Chapter 13 Plan Transmittal*, within the time and in the manner set forth in D.N.J. LBR 3015-1. A *Certification of Service, Notice of Chapter 13 Plan Transmittal*, and *valuation* must be filed with the Clerk of Court when the plan and transmittal notice are served.**

**a. Motion to Avoid Liens Under 11. U.S.C. Section 522(f). ☒ NONE**

The Debtor moves to avoid the following liens that impair exemptions:

Creditor	Nature of Collateral	Type of Lien	Amount of Lien	Value of Collateral	Amount of Claimed Exemption	Sum of All Other Liens Against the Property	Amount of Lien to be Avoided

**b. Motion to Avoid Liens and Reclassify Claim from Secured to Completely Unsecured.** ☒ **NONE**

The Debtor moves to reclassify the following claims as unsecured and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Superior Liens	Value of Creditor's Interest in Collateral	Total Amount of Lien to be Reclassified

**c. Motion to Partially Void Liens and Reclassify Underlying Claims as Partially Secured and Partially Unsecured.** ☒ **NONE**

The Debtor moves to reclassify the following claims as partially secured and partially unsecured, and to void liens on collateral consistent with Part 4 above:

Creditor	Collateral	Scheduled Debt	Total Collateral Value	Amount to be Deemed Secured	Amount to be Reclassified as Unsecured

**Part 8: Other Plan Provisions**

**a. Vesting of Property of the Estate**

- ☒ Upon confirmation  
☐ Upon discharge

**b. Payment Notices**

Creditors and Lessors provided for in Parts 4, 6 or 7 may continue to mail customary notices or coupons to the Debtor notwithstanding the automatic stay.



**c. Order of Distribution**

The Standing Trustee shall pay allowed claims in the following order:

- 1) Ch. 13 Standing Trustee commissions
- 2) Administrative Priority
- 3) Secured
- 4) Unsecured

**d. Post-Petition Claims**

The Standing Trustee ☐ is, ☒ is not authorized to pay post-petition claims filed pursuant to 11 U.S.C. Section 1305(a) in the amount filed by the post-petition claimant.

**Part 9: Modification ☐ NONE**

**NOTE: Modification of a plan does not require that a separate motion be filed. A modified plan must be served in accordance with D.N.J. LBR 3015-2.**

If this Plan modifies a Plan previously filed in this case, complete the information below.

Date of Plan being modified: 08/26/2020.

Explain below **why** the plan is being modified:

MidFirst cert of default is resolved. Resolution places arrears of \$5,405.99 and \$200.00 attorney fees into plan.

Explain below **how** the plan is being modified:

Arrears to MidFirst and their \$200.00 attorney fees are added to plan.

Are Schedules I and J being filed simultaneously with this Modified Plan?

☐ Yes

☒ No

**Part 10: Non-Standard Provision(s): Signatures Required**

Non-Standard Provisions Requiring Separate Signatures:

☒ NONE

☐ Explain here:

Any non-standard provisions placed elsewhere in this plan are ineffective.

**Signatures**

The Debtor(s) and the attorney for the Debtor(s), if any, must sign this Plan.

By signing and filing this document, the debtor(s), if not represented by an attorney, or the attorney for the debtor(s) certify that the wording and order of the provisions in this Chapter 13 Plan are identical to Local Form, *Chapter 13 Plan and Motions*, other than any non-standard provisions included in Part 10.

I certify under penalty of perjury that the above is true.

Date: 08/26/2020

/s/ John J. Worthy  
Debtor

Date: 08/26/2020

/s/ Georgina Worthy  
Joint Debtor

Date: 08/26/2020

/s/ Stacey L. Mullen, Esquire  
Attorney for Debtor(s)

## Certificate of Notice Page 11 of 12

United States Bankruptcy Court  
District of New JerseyIn re:  
John Worthy  
Georgina Worthy  
DebtorsCase No. 19-13736-JNP  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0312-1

User: admin  
Form ID: pdf901Page 1 of 2  
Total Noticed: 41

Date Rcvd: Aug 27, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 29, 2020.

db/jdb  
518045719 +John Worthy, Georgina Worthy, 217 Stirrup Road, Logan Twp., NJ 08085-1440  
518045709 +AWL, Inc., 2128 North 14th Street, Suite 1, #130, Ponca City, OK 74601-1831  
518045712 +Consumer Portfolio Services, P.O. Box 57099, Irvine, CA 92619-7099  
518045724 +Federal Loan Servicing, P.O. Box 69184, Harrisburg, PA 17106-9184  
518045706 +Golden Valley Lending, 635 East Highway 20 E., Upper Lake, CA 95485-8793  
518045728 #+KML Law Group, 216 Haddon Avenue, Suite 406, Westmont, NJ 08108-2812  
518045720 +Lexington National Ins. Corp., 11426 York Road, 2nd Floor, Cockeysville, MD 21030-1811  
518221357 +Makes Cents, Inc., d/b/a Maxlend, P.O. Box 639, Parshall, ND 58770-0639  
518045730 +MidFirst Bank, 999 NorthWest Grand Boulevard, Oklahoma City, OK 73118-6051  
518045705 +Midland Credit Management, P.O. Box 51319, Los Angeles, CA 90051-5619  
518045717 +Midland Mortgage, P.O. Box 26648, Oklahoma City, OK 73126-0648  
518045710 +New Jersey American Water, P.O. Box 371331, Pittsburgh, PA 15250-7331  
518045711 +Nona Ostrove, Esquire, 1020 Laurel Oak Road, Suite 100, Voorhees, NJ 08043-3518  
518045722 +Premier Bank Card, P.O. Box 5524, Sioux Falls, SD 57117-5524  
518045714 +Spotloan c/o Blue Chip Financial, P.O. Box 720, Belcourt, ND 58316-0720  
518165810 +State of NJ - Dept. of Labor, P.O. Box 951, Trenton, NJ 08625-0951  
U.S. Department of Education, c/o FedLoan Servicing, P.O. Box 69184, Harrisburg, PA 17106-9184

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. smg

Room 502, Rodino Federal Bldg., Newark, NJ 07102-2534 U.S. Attorney, 970 Broad St.,  
smg +E-mail/Text: ustpreion03.ne.ecf@usdoj.gov Aug 28 2020 00:08:27 United States Trustee,  
Office of the United States Trustee, 1085 Raymond Blvd., One Newark Center, Suite 2100,  
Newark, NJ 07102-5235  
518045726 +E-mail/Text: bruder@abcbail.com Aug 28 2020 00:09:06 ABC Bail Bonds,  
215 West Bridge Street, Morrisville, PA 19067-7118  
518045716 +E-mail/Text: bankruptcy@pepcoholdings.com Aug 28 2020 00:08:08 Atlantic City Electric,  
P.O. Box 13610, Philadelphia, PA 19101-3610  
518045725 +E-mail/PDF: AIS.cocard.ebn@americaninfosource.com Aug 28 2020 00:14:56 Capital One,  
P.O. Box 30285, Salt Lake City, UT 84130-0285  
518045718 +E-mail/Text: documentfiling@lciinc.com Aug 28 2020 00:07:39 Comcast, P.O. Box 70219,  
Philadelphia, PA 19176-0219  
518045727 +E-mail/PDF: gecsedirecoverycorp.com Aug 28 2020 00:14:46 Conseco Finance Servicing,  
332 Minnesota Street, Suite 600, St. Paul, MN 55101-7707  
518045713 +E-mail/Text: bankruptcy@caiar.com Aug 28 2020 00:08:22 Credit Adjustments, Inc.,  
330 Florence Street, Defiance, OH 43512-2593  
518045729 +E-mail/Text: bnc-bluestem@quantum3group.com Aug 28 2020 00:08:49 Fingerhut,  
6250 Ridgewood Road, St. Cloud, MN 56303-0820  
518045721 +E-mail/Text: collections@greentrustcash.com Aug 28 2020 11:32:30 Green Trust Cash,  
P.O. Box 340, Ft. Belknap Agency, Hays, MT 59527-0340  
518141493 E-mail/Text: JCAP\_BNC\_Notices@jcap.com Aug 28 2020 00:08:37 Jefferson Capital Systems LLC,  
Po Box 7999, Saint Cloud Mn 56302-9617  
518077845 E-mail/PDF: resurgentbknofications@resurgent.com Aug 28 2020 00:14:16 LVNV Funding, LLC,  
Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587  
518123957 +E-mail/Text: csc.bankruptcy@amwater.com Aug 28 2020 00:08:59 New Jersey American Water,  
P.O. Box 578, Alton, IL 62002-0578  
518045723 +E-mail/Text: bankruptcy@ldf-holdings.com Aug 28 2020 00:08:57 Niswi, LLC,  
d/b/a Amplify Funding, P.O. Box 542, Lac du Flambeau, WI 54538-0542  
518790872 E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Aug 28 2020 00:15:03  
Portfolio Recovery Associates, LLC, PO Box 41067, Norfolk, VA 23541  
518790873 E-mail/PDF: PRA\_BK2\_CASE\_UPDATE@portfoliorecovery.com Aug 28 2020 00:14:15  
Portfolio Recovery Associates, LLC, PO Box 41067, Norfolk, VA 23541,  
Portfolio Recovery Associates, LLC, PO Box 41067, Norfolk, VA 23541  
518139050 +E-mail/Text: JCAP\_BNC\_Notices@jcap.com Aug 28 2020 00:08:37 Premier Bankcard, LLC,  
Jefferson Capital Systems LLC Assignee, Po Box 7999, Saint Cloud Mn 56302-7999  
518045708 +E-mail/PDF: RACBANKRUPTCY@BBANDT.COM Aug 28 2020 00:14:15 Regional Acceptance Corp.,  
P.O. Box 830913, Birmingham, AL 35283-0913  
518119703 E-mail/PDF: RACBANKRUPTCY@BBANDT.COM Aug 28 2020 00:14:15 Regional Acceptance Corporation,  
PO Box 1847, Wilson, NC 27894-1847  
518047035 +E-mail/PDF: gecsedirecoverycorp.com Aug 28 2020 00:14:46 Synchrony Bank,  
c/o of PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021  
518069392 +E-mail/PDF: EBN\_AIS@AMERICANINFOSOURCE.COM Aug 28 2020 00:15:15 T Mobile/T-Mobile USA Inc,  
by American InfoSource as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901  
518045707 +E-mail/PDF: OGCRegionIIBankruptcy@hud.gov Aug 28 2020 00:13:23 US Dept of HUD,  
451 7th Street S.W., Washington, DC 20410-0001  
518193617 +E-mail/PDF: EBN\_AIS@AMERICANINFOSOURCE.COM Aug 28 2020 00:13:37 Verizon,  
by American InfoSource as agent, 4515 N Santa Fe Ave, Oklahoma City, OK 73118-7901  
518045715 +E-mail/Text: wfmelectronicbankruptcy@verizonwireless.com Aug 28 2020 00:07:37  
Verizon Wireless, P.O. Box 25505, Lehigh Valley, PA 18002-5505

TOTAL: 24

District/off: 0312-1

User: admin  
Form ID: pdf901

Page 2 of 2  
Total Noticed: 41

Date Rcvd: Aug 27, 2020

\*\*\*\*\* BYPASSED RECIPIENTS (continued) \*\*\*\*\*

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update.  
While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Aug 29, 2020

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 26, 2020 at the address(es) listed below:

Denise E. Carlon on behalf of Creditor MIDFIRST BANK dcarlon@kmlawgroup.com,  
bkgroup@kmlawgroup.com  
Isabel C. Balboa ecfmail@standingtrustee.com, summarymail@standingtrustee.com  
Isabel C. Balboa on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com,  
summarymail@standingtrustee.com  
Keri P. Ebeck on behalf of Creditor Consumer Portfolio Services, Inc. kebeck@bernsteinlaw.com,  
jbluemle@bernsteinlaw.com  
Keri P. Ebeck on behalf of Creditor Regional Acceptance Corporation kebeck@bernsteinlaw.com,  
jbluemle@bernsteinlaw.com  
Kevin Gordon McDonald on behalf of Creditor MIDFIRST BANK kmcdonald@kmlawgroup.com,  
bkgroup@kmlawgroup.com  
Rebecca Ann Solarz on behalf of Creditor MIDFIRST BANK rsolarz@kmlawgroup.com  
Stacey L. Mullen on behalf of Joint Debtor Georgina Worthy slmullen@comcast.net  
Stacey L. Mullen on behalf of Debtor John Worthy slmullen@comcast.net  
U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 10